



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 12, 2019

By Email and ECF

James M. Cole
Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-2) (AMD)

Dear Counsel:

Enclosed please find the government's thirteenth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0001451569- DOJ_HUAWEI_A_0001454942
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0001463554- DOJ_HUAWEI_A_0001463591
Communications related to Huawei Employees in Iran	SDM	DOJ_HUAWEI_A_0001454943- DOJ_HUAWEI_A_0001463553
Communications related to Huawei Employees in Iran	Discovery Material	DOJ_HUAWEI_A_0001467628- DOJ_HUAWEI_A_0001488105

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Julia Nestor
Alexander A. Solomon
Julia Nestor
David K. Kessler
Kaitlin Farrell
Sarah Evans
Assistant United States Attorneys
(718) 254-7000

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Laura Billings
Laura Billings
Christian J. Nauvel
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)